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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE	§	
	§	
BACKYARD WORKROOM, LLC	§	Case No. 22-41366
	§	
DEBTOR	§	

MOTION TO SELL PROPERTY OF THE ESTATE

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 660 N. CENTRAL EXPRESSWAY, 3<sup>RD</sup> FLOOR, PLANO, TEXAS 75074, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.**

**IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Backyard Workroom, LLC, Debtor in the above styled and numbered cause and files this its Motion to Sell Property of the Estate (“Motion”) and would respectfully show unto the Court as follows:

1. This Court has jurisdiction over this proceeding and the parties and property affected hereby pursuant to 28 U.S.C. §§1334 and 157. Consideration of the Motion constitutes a core proceeding as defined in 28 U.S.C. §157(b)(2)(A), (K), (M) and (O).
2. The Debtor commenced this proceeding on October 14, 2022 by filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code. Since the filing of the petition, the Debtor has remained in possession of its assets and continued in operation of its business as a debtor-in-possession pursuant to 11 U.S.C. §1184.
3. The Debtor's business consists of the design, manufacturing and installation of outdoor structure , commonly referred to as "tiny houses".
4. In order for the Debtor to maintain operations the Debtor is in need to capital infusions which the Debtor has not been able to obtain.
5. As a result of a determination that the panels used by the Debtor in its current operations are not sufficient to meet the requirements of many zoning agencies, the Debtor has determined the best alternative is to sell the company for an amount sufficient to replay the creditors.
6. The Debtor has received an offer to purchase the debtor's trade name, website, trademarks, tools, furniture fixtures, inventory and goodwill for the price of \$500,000.<sup>1</sup> ("Assets").
7. The purchaser is Sustainable Development Group, LLC ("Sustainable").
8. Sustainable is a third party not affiliated with the Debtor or any of its principals.
9. The terms of the sale are cash payment upon approval of the Bankruptcy Court.

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<sup>1</sup>For avoidance of doubt the sale does not include any patents or application for patents.

10. The Debtor seeks an Order approving the Sale with the net proceeds and be held pending further Order of this Court.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Hearing and that upon hearing, this Court enter an Order authorizing the Debtor's sale of the Assets described in this Motion, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By: /s/ Eric Liepins  
Eric A. Liepins, SBN 12338110  
PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent to all creditors via mail on this the 8th day of December 2022.

/s/ Eric Liepins  
Eric A. Liepins